

Ryan M. Shannon

From: Ryan M. Shannon
Sent: Tuesday, September 4, 2018 4:47 PM
To: 'Yeager, Jay'
Subject: RE: Shape files, 30(b)(6)

Jay,

I hope you had an enjoyable holiday.

Two items:

(1) On the below, the forwarded shape files are not the "Alternative Maps" referenced in/attached to the Complaint for the Senate and Congressional plans. (I note, however, that the forwarded shape file for the House Plan does appear to correspond to what was attached to the Complaint.) The Senate and Congressional maps that result from the shape files show significant differences (e.g., entirely different county configurations) just from an eyeball review compared to the PDF plan renderings attached to the Complaint.

Our specific request (request for production #10) was for the shape and data files associated with the *Complaint's* Alternative Maps. We requested copies of what was provided to Dr. Mayer in some of our other requests, but the information given in Dr. Mayer's deposition was that the "demonstration maps" he analyzed and references in his report were the same as the ones attached to the Complaint in any event. (Mayer Tr., pp. 155:20-p. 156:6.). From our review of the forwarded shape files, that appears not to be the case.

Can you please review this issue and let me know what you find in the near term? Did Dr. Mayer rely on the data associated with the Alternative Maps attached to the Complaint (per his deposition), or the data associated with this other set of maps? My further and more immediate request is that Plaintiffs provide the shape files for the Alternative Maps as attached the Complaint—that would be consistent with our Request for Production #10.

(2) Will Plaintiffs consent to a page extension on dispositive motions? Our request is to extend the length to 50 pages, maintaining 14 point font. It would be appreciated if you could let me know in the next few days.

I will be generally available tomorrow if it would help to discuss either item by phone. I am in the office this evening at 517.487.4719.

Regards,
Ryan

From: Yeager, Jay <Jay.Yeager@faegrebd.com>
Sent: Thursday, August 16, 2018 11:59 AM
To: Ryan M. Shannon <RShannon@dickinson-wright.com>
Subject: RE: Shape files, 30(b)(6)

Ryan –

Here are the shape files for the demo maps evaluated in Ken Mayer's report.

Do you have time this afternoon to meet and confer about the 30(b)(6) notice and the Chen source code production? I am clear after 4 pm.

Thanks.

From: Ryan M. Shannon <RShannon@dickinson-wright.com>
Sent: Wednesday, August 15, 2018 12:57 PM
To: Yeager, Jay <Jay.Yeager@faegrebd.com>
Subject: Shape files, 30(b)(6)

Jay,

Just following up on two items:

- (1) Can you advise on the status of the Demo map shape files, and in particular, commit to providing those yet this week?
- (2) Do you have a suggested date/location for the requested League 30(b)(6) deposition? We had discussed earlier this month pushing that beyond the close of discovery to the following week (including up to August 31). In the meantime, I am attaching and sending by mail a notice for August 24 in Lansing, but will revise that notice once we find a mutual date/place.

Regards,
Ryan

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